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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

DRY BULK SINGAPORE PTE. LTD.)	
)	
Plaintiff,)	
)	Case No.: 3:19-cv-1671
v.)	
)	IN ADMIRALTY
Amis Integrity S.A. <i>in personam</i> and)	
M/V AMIS INTEGRITY (IMO)	
9732412) her engines, freights, apparel,)	
appurtenances, tackle, etc., <i>in rem</i> ,)	
)	
Defendant.)	

DECLARATION OF C. KENT ROBERTS

I, C. Kent Roberts, declare as follows:

1. I am local counsel for plaintiff in the captioned action. I am over the age of 21 years, am competent to make this Declaration and be a witness in this case, and do so based on personal knowledge and belief.
2. Yesterday my office was preparing papers to seek a maritime arrest of the M/V

AMIS INTEGRITY pursuant to Rule C of the Supplemental Admiralty Rules. This Court signed Orders authorizing arrest of the vessel and appointment of a substitute custodian, Transmarine Navigation.

3. We learned of the need to arrest this vessel before it leaves the Columbia River yesterday morning. We immediately called the US Marshal's office for the District of Oregon. We were informed by Jason Fitzpatrick in that office that the US Marshal did not have an available deputy on Thursday, October 17 due to other court commitments and district training for deputies. Mr. Fitzpatrick advised that a deputy marshal would not be available until Friday, October 18. I called the US Marshal's office again this morning and was informed by operations supervisor Edwardo Sanchez that the US Marshal does not have an available deputy today, Thursday, October 17.

4. We have confirmed with the Merchants Exchange for Portland and the steamship agent for the vessels charterer that the ship is scheduled to complete loading at United Grain terminal in Vancouver, Washington between 1400 and 1800 hrs. today, is then to go to temporary Anchorage, and is to sail for the Philippines on the evening tide at about 2100 hrs.

5. It is important to plaintiff that the vessel be arrested before departure tonight to secure a very substantial claim (in excess of \$3.6 million). Because of the pending departure, the vessel will leave the District before an arrest can be effected unless the Court authorizes and deputizes another person to effect the arrest.

6. We are informed that similar emergency orders deputizing a responsible individual to serve a warrant of arrest for the US Marshal has occurred on prior occasions in the Ninth Circuit, for example, in Chemoil Corporation v. M/VARYA VISHNU, Case no. 3:13-CV-5494-RBL, US District Court for the Western District of Washington at Tacoma

(2013),

7. Plaintiff is nominating to be deputized, Caley Karrick, District Manager of Transmarine Navigation Corporation. Mr. Karrick is known to our law firm as a responsible and experienced steamship agent and ships' husband manager, with over 19 years in the maritime industry representing vessels. He has previously been involved in vessel arrest matters by the US Marshal. He holds a TWIC card for secure maritime facility access. He has advised his availability and willingness to act as a deputy in this matter.

8. Philip Brotherton, vice president of Transmarine Navigation Corporation, which has been appointed substitute custodian in this matter is aware of this request and has advised his company's availability to fulfill its duties upon notice that the vessel will in fact be arrested, and has also indicated that Transmarine will notify the US Coast Guard of the vessel arrest and the substitute custodian and deputized individual anticipated arrival at the vessel if the arrest is authorized pursuant to attached motion.

I declare under penalty of perjury under the laws of the state of Oregon in the United States that the foregoing is true and correct to the best of my knowledge and belief

Dated at Portland, Oregon this 17th day of October, 2019

s/ C. Kent Roberts

C. Kent Roberts, OSB #801010

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